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***REPLY TO NJ OFFICE**

February 15, 2018

VIA ECF

The Honorable Michael James B. Clark, III, U.S.M.J
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Ivan McKinney v. Dr. Hemsley, et al.
Civil Action No.: 2:14-cv-03564 (KM)(JBC)

Dear Judge Clark:

This office represents Defendants, Edward T. Pawson (improperly pleaded as "Capt. Pawson") and Robert J. Bigott (improperly pleaded as "Warden Bigott"), in the above matter.

As the Court is aware, the plaintiff in this matter is incarcerated at the New Jersey State Prison in Trenton. I have noticed his deposition for February 27, 2018. A court order is required to allow this to take place.

Transmitted herewith is a proposed order to accomplish this. I appreciate the Court's consideration and entry of same.

Respectfully submitted.

/s/ Leonard E. Seaman
LEONARD E. SEAMAN

LES:ap

Cc: Ivan McKinney (via regular mail)
Martin J. McAndrew, Esq. (via ECF and electronic mail (mmcandrew@okllp.com))
Client (via email)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IVAN G. MCKINNEY

Plaintiff,

vs.

DR. HEMSLEY, et al.

Defendants

Docket No.: 2:14-cv-03564-KM-JBC

Civil Action

ORDER

THIS MATTER having been opened to the Court on application by Defendants, Edward T. Pawson (improperly pleaded as “Capt. Pawson”), and Robert J. Bigott (improperly pleaded as “Warden Bigott”), for an order permitting the deposition of Plaintiff, Ivan G. McKinney to be taken in his place of incarceration, New Jersey State Prison, and the Court having considered the application and good cause having been shown,

IT IS this ____ day of February, 2018,

ORDERED that the deposition of Plaintiff, Ivan G. McKinney, shall take place on Tuesday, February 27, 2018, at 10:00 AM at the New Jersey State Prison, 600 Cass St, Trenton, NJ 08608 (the “Prison”) in accordance with the Federal Rules of Civil Procedure; and

IT IS FURTHER ORDERED that the Warden and staff of the Prison shall make such arrangements as necessary to permit the taking of the deposition at the date and time set forth above; and

IT IS FURTHER ORDERED that following individuals shall be admitted to the Prison for the purpose of conducting Plaintiff’s deposition:

1. Leonard E. Seaman, Esq., of the Law Offices of Richard Malagiere, 250 Moonachie Road, Suite 102, Moonachie, New Jersey 07074, attorney for Defendants, Edward T.

Pawson (improperly pleaded as “Capt. Pawson”) and Robert J. Bigott (improperly pleaded as “Warden Bigott”); and,

2. Martin J. McAndrew, Esq. of O'Connor Kimball LLP 51 Haddonfield Road, Suite 330, Cherry Hill, NJ 08002 attorney for Dr. Hemsley; and
3. A court reporter affiliated with GAF LEGAL SERVICES, 55 Eagle Rock Avenue, Unit HP-1, East Hanover, NJ 07936 (the “Court Reporter”); and,

IT IS FURTHER ORDERED that the Court Reporter shall be permitted to bring the following electronic equipment into the Prison: a stenographic writer, a laptop computer and any and all peripheral equipment, charging devices, or cables as needed for making a stenographic record of the proceedings; and,

IT IS FURTHER ORDERED that counsel for Defendant shall serve a copy of this Order on Plaintiff and on the Warden of New Jersey State Prison within _____ days of the date hereof.

The Honorable Michael James B. Clark, III